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HYNIX SEMICONDUCTOR INC. and
12 HYNIX SEMICONDUCTOR AMERICA INC.

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16
17 THE STATE OF CALIFORNIA et al.,
18
19 Plaintiffs,
20
21 v.

22 INFINEON TECHNOLOGIES AG et
23 al.,
24 Defendants.

Master File No. M-02-1486 PJH
MDL No. 1486
Case No. C 06-4333 PJH

Assigned for all purposes to the
Hon. Phyllis J. Hamilton

JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
DEFENDANTS' RESPONSE DATE TO
PLAINTIFFS' THIRD AMENDED
COMPLAINT

1 Plaintiffs and Defendants Elpida Memory, Inc. and Elpida Memory (USA)
2 Inc. (collectively "Elpida"), Infineon Technologies AG and Infineon Technologies North
3 America Corp. (collectively "Infineon"), Hynix Semiconductor Inc. and Hynix
4 Semiconductor America Inc. (collectively "Hynix"), Micron Technology, Inc. and Micron
5 Semiconductor Products, Inc. (collectively "Micron"), Mosel Vitelic Inc. and Mosel
6 Vitelic Corp. (collectively "Mosel"), Nanya Technology Corp. and Nanya Technology
7 Corp. USA (collectively "Nanya"), and NEC Electronics America, Inc., by and through
8 their counsel, jointly submit this stipulation regarding Defendants' response, whether by
9 answer or motion, to Plaintiffs' Third Amended Complaint filed with the Court on
10 November 7, 2007.

11
12 WHEREAS, the Court issued an order on April 15, 2008 granting in part
13 and denying in part Defendants' Motion to Dismiss; and

14
15 WHEREAS, the Defendants' response, whether by answer or motion, to
16 Plaintiffs' Third Amended Complaint is currently due on April 29, 2008.

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18 THEREFORE, IT IS HEREBY STIPULATED by the parties, by and
19 between their counsel and subject to Court approval, that without waiving the right to
20 assert any and all defenses available to Defendants, Defendants will respond to the Third
21 Amended Complaint, whether by answer or motion, by May 13, 2008.

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1 Dated: April 25, 2008

2 EDMUND G. BROWN, JR.
3 Attorney General of the State of California
4 THOMAS GREENE
5 KATHLEEN E. FOOTE
6 EMILIO E. VARANINI

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7 By: /s/ Emilio E. Varanini
8 Emilio E. Varanini

9 By: /s/ Steven H. Bergman
10 Steven H. Bergman

11 Liaison Counsel for Plaintiff States

12 *Attorneys for Hynix Semiconductor Inc.*
13 *and Hynix Semiconductor America Inc.*
14 *and, for purposes of this stipulation only,*
15 *signing with permission of all other*
16 *defendants*

17
18 **ATTESTATION OF FILING**

19 Pursuant to General Order No. 45 § X(B), I hereby attest that I have obtained
20 concurrence in the filing of this Joint Stipulation and [Proposed] Order Regarding
21 Defendants' Response Date to Plaintiffs' Third Amended Complaint from all of the
22 parties listed in the signature blocks above.

23 By: /s/ Steven H. Bergman
24 Steven H. Bergman

[PROPOSED] ORDER

Pursuant to the Stipulation of the parties, the Court hereby orders that Defendants shall respond to the Third Amended Complaint in *State of California v. Infineon Technologies AG*, Case No. C-06-4333 PJH, by answer or by motion, by May 13, 2008.

MAY 2

Dated: ~~April~~ May 2, 2008

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